

## KING &amp; SPALDING

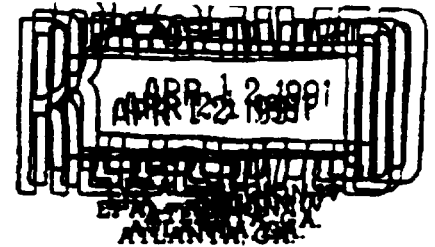
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April 12, 1991

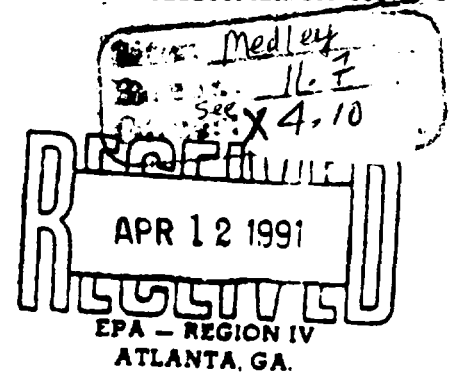
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VIA HAND DELIVERY

Mr. Jon K. Bornholm  
Remedial Project Manager  
United States Environmental  
Protection Agency, Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365



Re: Medley Farm Site

Dear Mr. Bornholm:

I am writing on behalf of the Medley Farm Site Steering Committee. In accordance with the National Contingency Plan, the Steering Committee hereby submits comments on the Environmental Protection Agency's ("EPA") proposed plan for remedial action at the Medley Farm Site ("the Proposed Plan").

The Proposed Plan calls for:

°recovery and treatment of groundwater that exceeds maximum contaminant levels at the Site; and

°soil vapor extraction to remove residual source contamination.

EPA has concluded that the low levels of contamination remaining in the soils at the Site pose no significant risk to human health and the environment. Nonetheless EPA has proposed that the soils be remediated through soil vapor extraction (SVE) to speed and enhance the groundwater remediation at the Site. The Steering Committee and its consultant, Sirrine Environmental Consultants, do not agree that soil remediation should be required in addition to direct groundwater remediation.

Almost all soil contamination was removed in the emergency removal action in 1983. The residual soil contamination remaining at the Site will naturally flush through and be captured by the

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groundwater recovery and treatment system with no significant impact on the operational life of that system. Groundwater remediation alone will result in a permanent reduction of Site contaminants. The proposed soil vapor extraction remedy would, therefore, add to the cost of remediation at the Site without appreciably reducing the potential risks posed by the Site or the length of time for full remediation to eliminate those potential risks.

The Steering Committee believes that soil vapor extraction should be eliminated from the plan for remedial action. We propose that EPA instead select natural flushing combined with groundwater recovery and treatment as the remedy for the Site. The effectiveness of this remedy will be reviewed after five years of implementation. The impact of natural flushing on the groundwater remediation can be evaluated more effectively at that time. At this point, the estimated impact is not significant enough to require a source control remedy such as soil vapor extraction.

The Steering Committee's position and alternative proposal are discussed more fully in the attached comments. The Steering Committee and Sirrine are available to answer any questions you might have.

Sincerely,

  
Mary Jane Norville

MJN:lwb

Attachment

cc: Elaine Levine (w/attachment)  
Keith Lindler (w/attachment)  
Jim Cloonan (w/attachment)  
Jim Chamness (w/attachment)  
Medley Farm Site Steering Committee (w/attachment)